

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

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| IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCT LIABILITY LITIGATION | MDL NO. 2873 |
| | Master Docket No. 2:18-mn-2873 |
| | This Document Relates to the Following Cases: <i>See Attached Exhibit A</i> |

**STIPULATION OF DISMISSAL OF RELEASED CLAIMS WITH PREJUDICE
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)¹**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs in the actions identified in Exhibit A attached hereto and Defendants The Chemours Company, The Chemours Company FC, LLC, DuPont de Nemours, Inc., Corteva, Inc., and E.I. DuPont de Nemours and Company n/k/a EIDP, Inc. (collectively, the “DuPont Defendants”) hereby stipulate and agree to a dismissal with prejudice of Plaintiffs’ claims against the DuPont Defendants that are “Released Claims” as defined in the Class Action Settlement Agreement between Class Representatives and the DuPont Defendants dated June 30, 2023, filed in *In re Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2:18-mn-2873 (D.S.C) (the “Agreement”).

The parties further stipulate and agree that any claims asserted by the Plaintiffs against the DuPont Defendants that are preserved under § 12.1.2(a) or 12.1.3(y) of the Agreement are not dismissed. The DuPont Defendants shall retain all defenses with respect to any such claim, including the right to argue that the claim is not preserved and is released. Plaintiffs reserve their rights against all other Defendants in the actions identified in Exhibit A attached hereto.

¹ This stipulation shall be conformed to reference and comply with applicable rules in any Litigation pending in state court.

Dated: May 24, 2024

Respectfully submitted,

/s/ Kenneth A. Sansone

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF system, which will automatically send notice of the same to all registered counsel of record.

Dated: May 24, 2024

/s/ Kenneth Sansone
Kenneth Sansone